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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

MADISON SQUARE BOYS & GIRLS CLUB, INC.,¹

Debtor.

Chapter 11

Case No. 22-10910 (SHL)

**NOTICE OF AGENDA FOR MATTERS SCHEDULED
FOR HEARING ON JULY 28, 2023 AT 11:00 A.M. (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that on June 29, 2022, the above-captioned debtor and debtor in possession (the “Debtor”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code with the United States Bankruptcy Court for the Southern District of New York (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that a hearing (the “Hearing”) has been scheduled to commence on July 28, 2023 at 11:00 a.m. (prevailing Eastern Time) before the Honorable Sean H. Lane, United States Bankruptcy Judge, Bankruptcy Court, 300 Quarropas Street, White Plains, New York 10601, in order to consider, among other things, the relief requested in the Pleadings (as defined below).

PLEASE TAKE FURTHER NOTICE that the Hearing will be held before the Honorable Sean H. Lane, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, New York 10601. The Hearing will be held both in person and remotely via Zoom for Government.

PLEASE TAKE FURTHER NOTICE that parties may appear remotely at the Hearing by registering at <https://www.nysb.uscourts.gov/ecourt-appearances> no later than 4:00 p.m. on the

¹ The last four digits of the Debtor’s federal tax identification number are 6792. The Debtor’s mailing address is 250 Bradhurst Avenue, New York, New York 10039.

business day before the Hearing (the “Appearance Deadline”). Following the Appearance Deadline, the Bankruptcy Court will circulate by email the Zoom link to the Hearing to those parties who have made an electronic appearance. Parties wishing to appear at the Hearing must attend in person or submit an electronic appearance through the Bankruptcy Court’s website by the Appearance Deadline and not by emailing or otherwise contacting the Bankruptcy Court. Additional information regarding the Bankruptcy Court’s Zoom and hearing procedures can be found on the Bankruptcy Court’s website.

PLEASE TAKE FURTHER NOTICE that copies of each document identified below can be viewed and/or obtained by: (i) accessing the Bankruptcy Court’s website at www.nysb.uscourts.gov, or (ii) from the Debtor’s claims and noticing agent, Epiq Corporate Restructuring, LLC, at <https://dm.epiq11.com/madisonsquare>, by calling (866) 977-1161 (toll free) for U.S. and Canada-based parties or +1 (503) 597-7709 for international parties, or by email at MadisonSquareInfo@epiqglobal.com. Note that a PACER password is needed to access documents on the Bankruptcy Court’s website.

PLEASE TAKE FURTHER NOTICE that the Hearing may affect your rights. Please read the pleadings identified below to be heard at the Hearing (collectively, the “Pleadings”) carefully.

PLEASE TAKE FURTHER NOTICE that if you oppose the relief requested in the Pleadings, or if you want the Bankruptcy Court to hear your position on the Pleadings, then you or your attorney must attend the Hearing. If you or your attorney do not follow the foregoing steps, the Bankruptcy Court may decide that you do not oppose the relief requested in the Pleadings and may enter orders granting the relief requested by the Debtor.

PLEASE TAKE FURTHER NOTICE that an agenda for the Hearing is set forth below.

I. UNCONTESTED MATTERS

1. Joint Motion of the Debtor and the Official Committee of Unsecured Creditors for Entry of an Order (A) Approving the Settlement Agreement Between the Debtor and The Rockefeller University and (B) Granting Related Relief [Docket No. 565] (the “Settlement Approval Motion”).

Response Deadline: July 26, 2023 at 12:00 p.m. (prevailing Eastern Time).

Responses Received:

- a. None.

Related Documents:

- a. Joint Motion of the Debtor and the Official Committee of Unsecured Creditors for an Order Shortening Notice with Respect to the Joint Motion of the Debtor and the Official Committee of Unsecured Creditors for Entry of an Order (A) Approving the Settlement Agreement Between the Debtor and The Rockefeller University and (B) Granting Related Relief [Docket No. 566].

- b. Certificate of Service [Docket No. 572].
- c. Order Shortening Notice with Respect to the Joint Motion of the Debtor and the Official Committee of Unsecured Creditors for Entry of an Order (A) Approving the Settlement Agreement Between the Debtor and The Rockefeller University and (B) Granting Related Relief [Docket No. 571].

Status: This matter is going forward on an uncontested basis.

- 2. Debtor's Motion for Entry of an Order Authorizing the Debtor to Exceed the Page Limit for the Debtor's (I) Memorandum of Law in Support of (A) Final Approval of Debtor's Disclosure Statement and (B) Confirmation of First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and (II) Reply to Objections Thereto [Docket No. 526]

Response Deadline: July 10, 2023 at 4:00 p.m. (prevailing Eastern Time)

Responses Received:

- a. None.

Related Documents:

- a. Debtor's (I) Memorandum of Law in Support of (A) Final Approval of Debtor's Disclosure Statement and (B) Confirmation of First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and (II) Reply to Objections Thereto [Docket No. 527]
- b. Certificate of Service [Docket No. 551]

Status: This matter is going forward on an uncontested basis.

- 3. Debtor's Motion for Entry of an Order Authorizing the Debtor to Redact and File Under Seal Certain Portions of (I) the Declaration of Daniel O'Brien in Support of Confirmation of the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and (II) the Declaration of Sharon Locatell, MAI, CRE, MRICS [Docket No. 545]

Response Deadline: July 3, 2023 at 4:00 p.m. (prevailing Eastern Time)

Responses Received:

- a. None.

Related Documents:

- a. Notice of Filing of Declaration of Daniel O'Brien in Support of Confirmation of the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 534]
- b. Notice of Filing of Declaration of Sharon Locatell, MAI, CRE, MRICS [Docket No. 535]
- c. Certificate of Service [Docket No. 550]
- d. Certificate of No Objection [Docket No. 558]

Status: This matter is going forward on an uncontested basis.

- 4. Disclosure Statement for Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 466]

Response Deadline: June 12, 2023 at 4:00 p.m. (prevailing Eastern Time). The Response Deadline was extended to June 16, 2023 at 12:00 p.m. (prevailing Eastern Time) solely for Federal Insurance Company and Century Indemnity Company. The Response Deadline was extended to July 3, 2023 at 4:00 p.m. (prevailing Eastern Time) solely for the United States Trustee for Region 2.

Responses Received:

- a. Statement and Reservation of Rights of the AIG Member Companies To Debtor's First Amended Chapter 11 Plan of Reorganization [Docket No. 519]
 - i. **Resolved.** The Objector has confirmed that it does not object to approval of the disclosure statement on a final basis at this time.
- b. Objection of The Rockefeller University to Confirmation of the Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and to Final Approval of the Disclosure Statement [Docket No. 520]
 - i. **Resolved.** The Objector's objection has been resolved pursuant to the terms of the settlement agreement described in the Settlement Approval Motion and subject to entry of an order approving the Settlement Approval Motion and entry of an order confirming the Plan.

Related Documents:

- a. Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 427]

- b. Disclosure Statement for Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 428]
- c. Order (I) Conditionally Approving the Adequacy of the Disclosure Statement; (II) Approving Form of Notices and Ballots; (III) Establishing (A) Solicitation and Voting Procedures and (B) Notice and Objection Procedures for Confirmation; (IV) Scheduling Combined Hearing on Confirmation of Plan of Reorganization and Final Approval of Disclosure Statement; and (V) Granting Related Relief [Docket No. 461]
- d. Notice of Combined Hearing to Consider Confirmation of Chapter 11 Plan of Reorganization and Final Approval of Disclosure Statement for Madison Square Boys & Girls Club, Inc. [Docket No. 468]
- e. Certificate of Service of Solicitation Materials [Docket No. 472]
- f. Certificate of Service [Docket No. 477]
- g. Notice of Supplement to the Disclosure Statement for Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 478]
- h. Debtor's (I) Memorandum of Law in Support of (A) Final Approval of Debtor's Disclosure Statement and (B) Confirmation of First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and (II) Reply to Objections Thereto [Docket No. 527]

Status: This matter is going forward on an uncontested basis.

II. CONTESTED MATTERS

- 5. First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 574]

Response Deadline: June 12, 2023 at 4:00 p.m. (prevailing Eastern Time). The Response Deadline was extended to June 16, 2023 at 12:00 p.m. (prevailing Eastern Time) solely for Federal Insurance Company and Century Indemnity Company. The Response Deadline was extended to July 3, 2023 at 4:00 p.m. (prevailing Eastern Time) solely for the United States Trustee for Region 2.

Responses Received:

- a. Limited Objection of the City of New York and New York City Economic Development Corporation to Debtor's Plan of Reorganization and Final Approval of Disclosure Statement Relating to Proposed Assumption of Executory Contracts and Unexpired Leases [Docket No. 517]

- i. **Resolved.** The Debtor received informal comments from the Objector to resolve this limited objection.
- b. Statement and Reservation of Rights of the AIG Member Companies To Debtor's First Amended Chapter 11 Plan of Reorganization [Docket No. 519]
 - i. **Resolved.** The Objector has confirmed that it does not object to confirmation at this time.
- c. Objection of The Rockefeller University to Confirmation of the Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and to Final Approval of the Disclosure Statement [Docket No. 520]
 - i. **Resolved.** The Objector's objection has been resolved pursuant to the terms of the settlement agreement described in the Settlement Approval Motion and subject to entry of an order approving the Settlement Approval Motion and entry of an order confirming the Plan.
- d. Reservation of Rights by Federal and Century Concerning Objections to Confirmation of Debtor's First Amended Plan of Reorganization [Docket No. 524]
 - i. **Resolved.** The Objector has confirmed that it does not object to confirmation at this time.
- e. Statement and Reservation of Rights of the United States Trustee Concerning the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 554]
 - i. **Resolved.** The Debtor received informal comments from the Objector to resolve this reservation of rights.
- f. Notice of Farragut Fort Greene Coalition's Objection to Confirmation of the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 559]
 - i. **Unresolved.** The Debtor and the Objector are continuing to work to resolve the Objector's concerns in advance of the hearing.

Related Documents:

- a. Order (I) Conditionally Approving the Adequacy of the Disclosure Statement; (II) Approving Form of Notices and Ballots; (III) Establishing (A) Solicitation and Voting Procedures and (B) Notice and Objection Procedures for Confirmation; (IV) Scheduling Combined Hearing on Confirmation of Plan of Reorganization and Final Approval of Disclosure Statement; and (V) Granting Related Relief [Docket No. 461]

- b. Disclosure Statement for Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 466]
- c. Notice of Combined Hearing to Consider Confirmation of Chapter 11 Plan of Reorganization and Final Approval of Disclosure Statement for Madison Square Boys & Girls Club, Inc. [Docket No. 468]
- d. Certificate of Service of Solicitation Materials [Docket No. 472]
- e. Certificate of Service [Docket No. 477]
- f. Notice of Supplement to the Disclosure Statement for Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 478]
- g. Notice of Filing of Plan Supplement to Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 507]
- h. Debtor's (I) Memorandum of Law in Support of (A) Final Approval of Debtor's Disclosure Statement and (B) Confirmation of First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and (II) Reply to Objections Thereto [Docket No. 527]
- i. Declaration of Jane Sullivan of Epiq Corporate Restructuring, LLC Regarding the Solicitation and Tabulation of Ballots Cast on the Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 528]
- j. Declaration of Robin Chiu in Support of (I) Final Approval of Debtor's Disclosure Statement and (II) Confirmation of First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 529]
- k. Declaration of Jeffrey Dold in Support of Confirmation of the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 530]
- l. Notice of Filing of Declaration of Robin Chiu in Support of Confirmation of the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 531]
- m. Joinder of the Official Committee of Unsecured Creditors in Support of Debtors (I) Memorandum of Law in Support of (A) Final Approval of Debtors Disclosure Statement and (B) Confirmation of First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. and (II) Reply to Objections Thereto [Docket No. 532]
- n. Certificate of Service [Docket No. 533]

- o. Notice of Filing of Declaration of Daniel O'Brien in Support of Confirmation of the First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 534]
- p. Notice of Filing of Declaration of Sharon Locatell, MAI, CRE, MRICS [Docket No. 535]
- q. Certificate of Service [Docket No. 550]
- r. Certificate of Service [Docket No. 551]
- s. Stipulation and Scheduling Order for Combined Hearing [Docket No. 562]
- t. Notice of Filing of Revised First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 574]
- u. Notice of Filing of Further Revised Compensation Trust Agreement [Docket No. 575]
- v. Notice of Filing of Revised Proposed Findings of Fact, Conclusions of Law, and Order Confirming First Amended Chapter 11 Plan of Reorganization of Madison Square Boys & Girls Club, Inc. [Docket No. 591]

Status: This matter is going forward on a contested basis.

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New York, New York
Dated: July 26, 2023

/s/ John T. Weber

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